

EXHIBIT 1

1 A. I know who she is.

2 Q. Who is she?

3 A. She's a lady back in Virginia that does law
4 clerking.

5 Q. Do you have any reason to know why she would 10:32:48AM
6 be cc'd on this invoice back --

7 A. I have -- I have no idea whatsoever --

8 Q. -- in 2005?

9 A. I have no idea.

10 Q. You have no idea why she would be copied on 10:33:02AM
11 this?

12 A. How would I know?

13 Q. As you can see from Woodhead 7, KM was
14 invoicing Ms. Lu and my client, Mr. So.

15 Do you see that? 10:33:30AM

16 A. Yes.

17 Q. For the participation and as settlement of
18 certain trades that were being undertaken in London.

19 Do you see that?

20 A. I see that. 10:33:40AM

21 Q. All right. So who was paying these others
22 finders or these other introducers? Was it Land
23 Base, or were they billing Mr. So directly?

24 A. I believe Mr. Lopatin was issuing checks to
25 them. 10:33:55AM

1 Q. Mr. Lopatin was issuing checks to them.

2 Well, according to Woodhead No. 7, though,
3 they were billing -- they too were billing my client
4 directly as well.

5 A. This appears to be some sort of double dip.
6 I have no knowledge of this. I have never seen this.

10:34:05AM

7 So this is why you said Lucy Lu. Lucy Yan
8 Lu.

9 Q. You said Ms. Meltzer was a law clerk?

10 A. Uh-huh.

10:34:56AM

11 Q. Yes?

12 When was the last time you talked to her?

13 A. We send e-mails all the time.

14 Q. I'm sorry?

15 A. We send e-mails, you know. Jokes and
16 spiritual stuff.

10:35:04AM

17 Q. When was the last e-mail you may have
18 received from her?

19 A. Last week.

20 Q. Have you received any e-mails from her with
21 regard to this litigation?

10:35:11AM

22 A. No.

23 Q. Do you know if she's aware of this
24 litigation?

25 A. I have no idea.

10:35:21AM